

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v

NO: MJ-04-815-MBB

TONY TEIXEIRA

DEFENDANT'S RENEWED MOTION FOR BAIL

Now comes the defendant, Tony Teixeira, and moves that this Court grant him bail in accordance with the following conditions:

1. The defendant is prepared to secure his bond with property in Massachusetts worth \$295,000.00, in which there is \$245,000.00 in equity.
2. The defendant agrees to wear an electronic monitoring bracelet.
3. The defendant is prepared to start work upon his release, if allowed, having recently completed an Associates Degree in air conditioning and refrigerator repair at Bay State Community College in Canton, Massachusetts.

In further support, the defendant states that he has strong family ties in Brockton, Massachusetts, where he was born on January 5, 1981. He has lived there ever since with his parents, Pedro and Domingas Teixeira, at 204 Green Street. Mr. Teixeira has five brothers and sisters, ranging in age from twenty-two and thirty-one. In addition, Mr. Teixeira has three nieces and two nephews. Mr. Teixeira has played a direct role in the rearing of two of his nieces, Kira, eight, and Jasmine, nine, both of whom live at the house at 204 Green Street.

Mr. Teixeira's father has been disabled for two years. Before his injury he worked as a machine operator in Raynham, Massachusetts. Mrs. Teixeira, a CNA, or certified nursing, works two jobs, one at the Guardian Center, a nursing home, and the other at the Brockton Hospital. Mr.

Teixeira provides invaluable support to his parents, taking responsibility for the work his father is unable to perform, including maintenance and repairs. He recently replaced the sheet rock in the living room.

In December of 2003, Mr. Teixeira received an Associates Degree in air conditioning and refrigeration from Bay State Community College in Canton, Massachusetts. He earlier received a GED. Mr. Teixeira has work awaiting him as an apprentice plumber, and is eager to continue his professional advancement.

Mr. Teixeira is a young man with deep-running roots and family ties in Brockton, Massachusetts. He has lived in Brockton his entire life, and has never traveled far from there. He does not have a passport. As well as that, Mr. Teixeira holds an advanced degree, and is prepared to go to work immediately. Mr. Teixeira has meritorious defenses to the charge against him, and has a great interest in defending his case. He presents no risk of flight and is not a danger to the community.

For these reasons, and in consideration of the conditions described above, the defendant respectfully requests that this Court grant him a reasonable bail. Since the last hearing on this issue, on December 16, 2004, the defendant has been interviewed by Pretrial Services. The defendant's family has also taken the necessary steps to comply with the requirements established by the United States District Court for posting real property as bond. The defendant requests a hearing on this matter on Monday, May 2, 2005, at 2:15 pm.

Respectfully submitted,  
Tony Gomes Teixeira,



C. Samuel Sutter, Esquire  
203 Plymouth Avenue  
Fall River, Massachusetts 02721  
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FROM :

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**CERTIFICATE OF SERVICE**

TONY TEIXEIRA

I, Kelley Anne Sylvia, hereby certify that on Thursday, April 28, 2005, I sent, by facsimile (617) 748-3974, a copy of Defendant's Renewed Motion for Bail to United States Assistant Attorney Timothy Q. Feeley, 1 Courthouse Way, Boston, Massachusetts 02210.

Kelley Anne Sylvia  
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